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Attorneys for Defendants
County of Alameda and Alameda County Deputy
Sheriff Joshua Mayfield

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

JOSEPH P. CUVIELLO and DENIZ
BOLBOL, individually,

Plaintiffs,

v.

ROWELL RANCH RODEO, INC.;
HAYWARD AREA RECREATION AND
PARK DISTRICT; HAYWARD AREA
RECREATION AND PARK DISTRICT
PUBLIC SAFETY MANAGER/RANGER
KEVIN HART; ALAMEDA COUNTY
SHERIFF'S OFFICE; ALAMEDA COUNTY
DEPUTY SHERIFF JOSHUA MAYFIELD;
and DOES 1 and 2, in their individual and
official capacities, jointly and severally,

Defendants.

Case No. 3:23-cv-01652-VC

**STIPULATION FOR CONTINUANCE
OF DISCOVERY DATES;
~~PROPOSED~~ ORDER**

Action Filed: April 6, 2023
Trial Date: October 21, 2024

STIPULATION

The parties appearing in this action, Plaintiffs JOSEPH P. CUVIELLO and DENIZ BOLBOL, and Defendants ROWELL RANCH RODEO, INC., HAYWARD AREA RECREATION AND PARK DISTRICT, HAYWARD AREA RECREATION AND PARK DISTRICT MANAGER/RANGER KEVIN HART, ALAMEDA COUNTY, ALAMEDA COUNTY DEPUTY SHERIFF JOSHUA MAYFIELD, by and through their respective undersigned counsel, hereby enter into the following stipulation:

1. The parties have diligently conducted discovery in this case, including the exchange of Initial Disclosures and two sets of written discovery and the production of voluminous documents;

2. The parties attended a Mandatory Settlement Conference on October 16, 2023; the case did not, however, resolve at that time;

3. The parties are also currently meeting and conferring to schedule the depositions of plaintiffs Joseph P. CuvIELlo and Deniz Bolbol, defendants Deputy Joshua Mayfield and Kevin Hart, and non-party Gary Houts;

4. However, because of the schedules of the parties and their counsel, including several trials set for the month of January 2024 and the first half of February 2024, the parties will not be able to complete the depositions of these five witnesses by the January 31, 2024 discovery cut off or even by February 29, 2024;

5. So that the parties can complete their investigation, discovery, and trial preparation, and in turn have sufficient information with which to engage in further meaningful settlement discussions, the parties jointly request that the current Close of Fact Discovery be continued from January 31, 2024 to March 15, 2024; the current Designation of Experts deadline be continued from March 31, 2024 to April 19, 2024; and the current Close of Expert Discovery be continued from May 1, 2024 to May 24, 2024;

6. The requested extensions of time will not otherwise affect the Court's schedule for the case, as set forth in the Court's Minute Order dated July 14, 2023, Docket No. 64;

7. The parties have not previously stipulated to or requested an extension of time for any deadline set by the Court, other than extensions of time to respond to written discovery.

IT IS THEREFORE AGREED, STIPULATED, AND REQUESTED THAT:

1. The current Close of Fact Discovery be continued from January 31, 2024 to March 15, 2024; the current Designation of Experts deadline be continued from March 31, 2024 to April 19, 2024; and the current Close of Expert Discovery be continued from May 1, 2024 to May 24, 2024;

2. The other dates set by the Court's Minute Order dated July 14, 2023, Docket No. 64, will remain unchanged.

Dated: December 28, 2023

GREENFIRE LAW, PC

By: /s/ Jessica L. Blome

Jessica L. Blome
Lily A. Rivo
Attorneys for Plaintiff
Deniz Bolbol

Dated: December 28, 2023

IN PRO PER

By: /s/ Joseph P. Cuvillo

Joseph P. Cuvillo
Plaintiff

Dated: December 28, 2023

ALLEN, GLAESSNER, HAZELWOOD &
WERTH, LLP

By: /s/ Dale L. Allen, Jr.

Dale L. Allen, Jr.
Nicholas D. Syren
Attorneys for Defendants
Hayward Area Recreation and Park
District and Kevin Hart

1 Dated: December 28, 2023

GORDON REES SCULLY MANSUKHANI
LLP

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3 By: /s/ Paul Caleo

4 Paul Caleo
5 Osmaan Khan
6 Attorneys for Defendant
Rowell Ranch Rodeo, Inc.

7 Dated: December 28, 2023

FENNEMORE WENDEL

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9 By: /s/ Marc Brainich

10 William B. Rowell
11 Thiele R. Dunaway
12 Marc Brainich
13 Michele C. Kirrane
14 Attorneys for Defendants
15 County of Alameda and Alameda County
16 Deputy Sheriff Joshua Mayfield
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~~PROPOSED~~ ORDER

A STIPULATION FOR CONTINUANCE OF DISCOVERY DATES was jointly presented by Plaintiffs Joseph P. CuvIELlo and Deniz Bolbol and Defendants Rowell Ranch Rodeo, Inc., Hayward Area Recreation and Park District, Kevin Hart, County of Alameda, and Alameda County Deputy Sheriff Joshua.

The Court, having considered the parties' Stipulation, and good cause appearing therefor, **HEREBY ORDERS** that:

1. The current Close of Fact Discovery is continued from January 31, 2024 to March 15, 2024; the current Designation of Experts deadline is continued from March 31, 2024 to April 19, 2024; and the current Close of Expert Discovery is continued from May 1, 2024 to May 24, 2024;

2. The other dates set by the Court's Minute Order dated July 14, 2023, Docket No. 64, will remain unchanged.

IT IS SO ORDERED.

Dated: January 3, 2024



Hon. Vince Chhabria
United States District Judge